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Martha's Vineyard Commission Old Stone Building Oak Bluffs MA 02557

January 9, 2014

# Re DRI 89 M3 Stop & Shop expansion

**Dear Commissioners:** 

The Vineyard Conservation Society (VCS) is a non-profit membership organization dedicated to preserving the environment, character and quality of life of Martha's Vineyard through advocacy, education, and the protection of the Island's land and waters. We offer the following comments on the above-referenced DRI.

VCS was formed nearly 50 years ago by Island people intent on protecting the land and unique character of this special place. That character is prized by residents and visitors, is the reason for the creation of the Commission's unique enabling legislation, and is a key to the Island's economic engine.

We are concerned that the proposed development undermines this unique balance in an unacceptable way. Potential detriments of the proposal have been detailed by MVC commissioners, staff and in the public testimony record over the last 10 months. These include transportation and traffic impacts, impacts of a development of this size, site constraints, noise, historic character impacts, and the unsettled nature of the off-site Town property negotiations.

### TRAFFIC

VCS would like to echo concerns about traffic eroding Island character, threatening the smooth operation of our regional transportation system, and putting at risk public health and safety by restricting access to our hospital when time may be of-the-essence.

As an environmental organization, VCS would also like to flag the concern that increased traffic brings increased air pollution and fuel consumption. In this context, we understand that the Five Corners area at peak traffic times already has the distinction of being an air pollution "hot spot" in EPA surveys of national ambient air quality standards for particulate matter.

## **SEA LEVEL RISE**

The applicant has prepared a storm water management plan citing the fact that the site is in a designated flood zone. To inform your balancing calculation of benefits and detriments, it is worth repeating that climate changes currently underway are altering those designations.

VCS has tried in our "Rising Seas" educational initiative to bring to the attention of leadership and the public how projected one-and-two meter sea level rise over the next century will impact the Island, particularly the downtown areas.

The projections for Vineyard Haven can be viewed at the bottom of the climate page on our website, <u>HERE</u>. Map key is as follows: areas shaded in yellow will be underwater with a sea level rise of 3.3 feet, red areas are completely submerged with a rise of 6.6 feet. The inundation projections don't show anticipated additional impacts of factors like storm surge.

The mapping assumes a "business as usual" approach to global energy use. The amount of sea level rise that will occur will depend on our current and future choices in that regard, and we strongly believe that we all have an obligation to contribute small steps on the local level. Idling in worsened Five Corners traffic is not a positive contribution.

More specifically, under a "High Emissions" scenario developed by a UN working group, Martha's Vineyard can expect between 3 and 5.6 feet of sea level rise by 2100. With greater energy conservation, improved efficiency of our machines, and faster transition to clean energy, we can avoid such a catastrophic amount of sea level rise.

It appears that the site of this DRI will be impacted. It is therefore appropriate to weigh the relative benefit of significant new investment in infrastructure there.

### N. AMERICAN vs EUROPEAN MODELS

Martha's Vineyard is different. Well planned, human-scale development is key to a thriving economy. It is what the community demands. The applicant's handbook for its European operations prides itself on fitting into existing small, historic communities like ours. The applicant clearly has the expertise to do this. VCS respectfully suggests that that model be brought here.

## HISTORICAL RESOURCES

Consistent with that thinking, VCS endorses the option (presented in the Public Archaeological Lab historical assessment) of in-situ preservation the Caleb Prouty House, recognizing the fact that (1) it is one of the structures in this area that survived the Great Fire of 1883, (2) is eligible for individual listing in the National Register of Historic Places at the local level of significance, and (3) it is among the best preserved examples of its type and period in the village of Vineyard Haven.

Thank you for the opportunity to comment.

Sincerely,

Brendan O'Neill

**Executive Director** 

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